



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 4:17CR118
)	
v.)	18 U.S.C. § 1349
)	Conspiracy to Commit Bank Fraud
MARLON MCKNIGHT)	(Count 1)
(Counts 1, 2-3, 14-16, 21))	
)	18 U.S.C. §§ 1344 and 2
KARIVA CROSS)	Bank Fraud
(Counts 1, 6, 13-15, 18, 21))	(Counts 2-15)
)	
ERICA LATIN-HUNTER,)	18 U.S.C. §§ 1028A and 2
(Counts 1, 4-5, 17))	Aggravated Identity Theft
)	(Counts 16-21)
PAMELA WYATT,)	
(Counts 1, 7-8, 19))	18 U.S.C. § 982(a)(2)
)	Asset Forfeiture
ANTOINETTE BEAMON)	
(Counts 1, 9, 12, 19-20))	
)	
THERBIA PARKER, JR.,)	
(Counts 1, 10-11, 20))	
)	
Defendants.)	

SUPERSEDING INDICTMENT

January 2018 Term - At Newport News, Virginia

GENERAL ALLEGATIONS

1. Langley Federal Credit Union ("LFCU") is a financial institution, as defined in Title 18, United States Code, Section 20, operating in the Eastern District of Virginia and elsewhere. Specifically, LFCU is a member-owned, not-for-profit financial cooperative chartered and regulated under the authority of the National Credit Union Administration ("NCUA"), which administers the National Credit Union Share Insurance Fund.

2. LFCU accepts applications for LFCU membership through, among other means, its Internet-connected website. Among other accounts and services, LFCU offers its members consumer loans, including but not limited to personal loans and vehicle loans. LFCU also accepts online applications for such consumer loan accounts.

3. Among other information, LFCU requires applicants for membership and consumer loans to provide various means of identification, as defined in Title 18, United States Code, Section 1028(d)(7), including the applicant's name, date of birth, and social security number. For vehicle loans, LFCU further requires vehicle information, including the year, make, model, and vehicle identification number ("VIN") of the vehicle identified as collateral for the loan. The truth and accuracy of this personal identifying information and vehicle information is material to LFCU's decisions to open, approve, and issue such memberships and consumer loans.

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. Beginning on a date unknown to the Grand Jury, but believed to be no later than in or about at least December 2015 and continuing until a date unknown but believed to be through in or about at least May 2016, in the Eastern District of Virginia and elsewhere, MARLON MCKNIGHT, KARIVA CROSS, ERICA LATIN-HUNTER, PAMELA WYATT, ANTOINETTE BEAMON, and THERBIA PARKER JR., the defendants herein, and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to knowingly execute and attempt to execute a scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

WAYS, MANNER, AND MEANS OF THE CONSPIRACY

The ways, manner, and means by which the foregoing objectives of the conspiracy to commit bank fraud were to be accomplished included, but were not limited to, the following:

3. The primary purpose of the conspiracy and the scheme and artifice was for MCKNIGHT, CROSS, LATIN-HUNTER, WYATT, BEAMON, PARKER, and other conspirators to obtain through fraudulent means money, funds, credits, assets, securities, and other property owned by and under the control of financial institutions located in the Eastern

District and elsewhere, including LFCU, by using stolen personal identifying information to fraudulently obtain loans and loan proceeds from such institutions in the names of others.

4. It was part of the conspiracy and the scheme and artifice that conspirators fraudulently obtained through various means personal identifying information of other individuals, including names, dates of birth, social security numbers, and copies of government-issued identification documents.

5. It was further part of the conspiracy and the scheme and artifice that conspirators used the fraudulently obtained personal identifying information of others to apply for, open, and attempt to open new member, bank, credit, and consumer loan accounts in the names of the individuals to whom that information belonged, without their knowledge or consent. Conspirators applied for, opened, and attempted to open such accounts with financial institutions operating in the Eastern District of Virginia and elsewhere, including LFCU.

6. It was further part of the conspiracy and the scheme and artifice that conspirators opened additional accounts in their own names with the same financial institutions, including LFCU, which accounts conspirators used in furtherance of the conspiracy and the scheme and artifice as described herein.

7. It was further part of the conspiracy and the scheme and artifice that conspirators used Internet-connected computers and terminals to apply for, open, and attempt to open the accounts described herein.

8. It was further part of the conspiracy and the scheme and artifice that, when applying for and opening accounts in the names of others, conspirators provided materially false information concerning, among other things, the true identity of the applicant and, in the case of vehicle loans, the collateral used to secure those loans. Among other things, conspirators falsely

claimed to be the titleholders and sellers of vehicles they did not own and over which they did not exercise control.

9. It was further part of the conspiracy and the scheme and artifice that conspirators submitted via, among other means, facsimile transmissions forged and counterfeit vehicle titles and bills of sale, which documents falsely identified conspirators, including MCKNIGHT and LATIN-HUNTER, as the owners and sellers of the vehicles listed as collateral in fraudulent loan applications.

10. It was further part of the conspiracy and the scheme and artifice that, through the false promises and material misrepresentations described herein, conspirators caused financial institutions, including LFCU, to issue consumer loans, including personal loans and vehicle loans, in the names of others, without those individuals' knowledge or consent.

11. It was further part of the conspiracy and the scheme and artifice that, in the case of fraudulently obtained personal loans, conspirators directed and caused the issuing financial institutions, including LFCU, to deposit the proceeds of such personal loans into accounts conspirators had opened with the same institutions in the names of the individuals falsely identified as the applicants for such loans.

12. It was further part of the conspiracy and the scheme and artifice that, following the disbursement of such personal loan proceeds into these fraudulently opened accounts, conspirators transferred those proceeds via the Internet to accounts issued by the same financial institutions to conspirators, including CROSS, WYATT, BEAMON, and PARKER.

13. It was further part of the conspiracy and the scheme and artifice that, following such transfers, conspirators, including MCKNIGHT, CROSS, WYATT, BEAMON, and PARKER, withdrew the transferred loan proceeds in the form of U.S. currency from the

accounts into which conspirators had transferred those proceeds. Conspirators, including MCKNIGHT, CROSS, WYATT, BEAMON, and PARKER, conducted these withdrawals at branches of the financial institutions that had issued the personal loans, which branches were located in the Eastern District of Virginia.

14. It was further part of the conspiracy and the scheme and artifice that, in the case of fraudulently obtained vehicle loans, conspirators caused the issuing financial institutions, including LFCU, to create and print financial instruments, including checks, made payable to conspirators who posed as vehicle sellers, including MCKNIGHT and LATIN-HUNTER, in the full amount of the fraudulently obtained vehicle loans.

15. It was further part of the conspiracy and the scheme and artifice that conspirators caused the financial institutions issuing such loans to mail and ship such financial instruments, including checks, via the United States mails and private commercial interstate carriers to locations in the Eastern District of Virginia.

16. It was further part of the conspiracy and the scheme and artifice that conspirators removed such financial instruments, including checks, from the United States mails and from authorized depositories for mail matter.

17. It was further part of the conspiracy and the scheme and artifice that conspirators, including MCKNIGHT and LATIN-HUNTER, presented such instruments for negotiation and cashing at branches of the financial institutions that had issued the vehicle loans, which branches were located in the Eastern District of Virginia, and thereby obtained and attempted to obtain additional financial instruments, including checks, and U.S. currency in the full amount of such fraudulently obtained vehicle loans.

(In violation of Title 18, United States Code, Sections 1349 and 1344.)

COUNTS TWO THROUGH FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 3 of the General Allegations and in Paragraphs 3 through 17 of Count One set forth above.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia and elsewhere, MARLON MCKNIGHT, KARIVA CROSS, ERICA LATIN-HUNTER, PAMELA WYATT, ANTOINETTE BEAMON, and THERBIA PARKER JR., the defendants herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities owned by and under the custody and control of Langley Federal Credit Union ("LFCU"), which qualifies as a financial institution as defined under Title 18, United States Code, Section 20, by means of the materially false and fraudulent pretenses, representations and promises identified below:

Count	Date (On or About)	Defendant	Location	Description/Purpose of Transaction
2	12/5/2015	MCKNIGHT	LFCU **** Granby St. Norfolk, Virginia	Cashing of check number 1220071 made payable to MCKNIGHT the amount of \$19,500, which check was drawn on an LFCU vehicle loan account (ending in 5491-L50) fraudulently opened in the name of D.P.

3	12/7/2015	MCKNIGHT	LFCU *** Aberdeen Rd. Hampton, Virginia	Cashing of check number 1168693 made payable to MCKNIGHT in the amount of \$8,000, which check was funded with proceeds of the LFCU vehicle loan account (last four digits ending in 5491-L50) fraudulently opened in the name of D.P. and issued at MCKNIGHT'S direction during the transaction charged in Count 2.
4	12/12/2015	LATIN-HUNTER	LFCU **** Granby St. Norfolk, Virginia	Cashing of check number 1220114 made payable to LATIN-HUNTER regarding K.B. and "2013 Nissan" in the amount of \$37,000, which check was drawn on an LFCU vehicle loan account (ending in 6072-L50) fraudulently opened in the name of K.B.
5	12/14/2015	LATIN-HUNTER	LFCU *** Aberdeen Rd. Hampton, Virginia	Cashing of check number 1168728 made payable to LATIN-HUNTER in the amount of \$22,000, which check was funded with proceeds of the LFCU vehicle loan account (last four digits ending in 6072-L50) fraudulently opened in the name of K.B. and issued at LATIN-HUNTER's direction during the transaction charged in Count 4.
6	4/20/2016	CROSS	LFCU *** Aberdeen Rd. Hampton, Virginia	Withdrawal of \$600.00 from LFCU checking account (ending in 9009-S14) following transfer of \$1,100.00 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 5191-S11) fraudulently opened in the name of M.C.
7	4/21/2016	WYATT	LFCU *** Aberdeen Rd. Hampton, Virginia	Withdrawal of \$5,000 from LFCU savings account (ending in 4602-S1) following transfer of \$5,000 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 7388-S11) fraudulently opened in the name of R.D.

8	4/25/2016	WYATT	LFCU *** Aberdeen Rd. Hampton, Virginia	Withdrawal of \$5,000 from LFCU savings account (ending in 4602-S1) following transfer of \$5,000 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 7388-S11) fraudulently opened in the name of R.D.
9	4/29/2016	BEAMON	LFCU *** Volvo Pkwy. Chesapeake, Virginia	Withdrawal of \$5,000 from LFCU savings account (ending in 8170-S1) following transfer of \$5,000 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 7388-S11) fraudulently opened in the name of R.D.
10	5/7/2016	PARKER	LFCU **** Taylor Rd. Chesapeake, VA	Withdrawal of \$4,500 from LFCU checking account (ending in 9319-S14) following transfer of \$5,000 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 8805-S11) fraudulently opened in the name of M.K.
11	5/9/2016	PARKER	LFCU **** Taylor Rd. Chesapeake, VA	Withdrawal of \$5,000 from LFCU checking account (ending in 9319-S14) following transfer of \$5,500 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 8805-S11) fraudulently opened in the name of M.K.
12	5/10/2016	BEAMON	LFCU **** Granby St. Norfolk, Virginia	Withdrawal of \$5,000 from LFCU savings account (ending in 8170-S1) following transfer of \$5,000 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 8805-S11) fraudulently opened in the name of M.K.

13	6/25/2016	CROSS	LFCU *** Aberdeen Rd. Hampton, Virginia	Withdrawal of \$2,500.00 from LFCU checking account (ending in 9009-S14) following transfer of \$5,000.00 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 3294-S11) fraudulently opened in the name of M.B.
14	6/28/2016	MCKNIGHT CROSS	LFCU *** Aberdeen Rd. Hampton, Virginia	Withdrawal of \$2,500.00 from LFCU checking account (ending in 9009-S14) following transfer of \$3,800.00 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 3294-S11) fraudulently opened in the name of M.B.
15	6/29/2016	MCKNIGHT CROSS	LFCU **** W. Mercury Blvd. Hampton, Virginia	Withdrawal of \$900.00 from LFCU checking account (ending in 9009-S14) following transfer of \$3,800.00 of fraudulently obtained personal loan proceeds from an LFCU checking account (ending in 3294-S11) fraudulently opened in the name of M.B.

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNTS SIXTEEN THROUGH TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 3 of the General Allegations and in Paragraphs 3 through 17 of Count One set forth above.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MARLON MCKNIGHT, KARIVA CROSS, ERICA LATIN-HUNTER, PAMELA WYATT, ANTOINETTE BEAMON, and THERBIA PARKER JR., the defendants herein, along with and aided and abetted by others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions contained in Chapter 63 of Title 18, to wit: Conspiracy to Commit Bank Fraud, in violation of Title 18, United States Code, Section 1349:

Count	Date (On or About)	Defendant(s)	Means of Identification	Description/Purpose of Transaction	Felony Violation
16	12/1/2015	MCKNIGHT	Name, date of birth (**/**/1951), and social security number (last four digits 3022) of D.P.	Fraudulent application and opening of LFCU membership (last four digits 5491), savings account (ending in 5491-S1), and vehicle loan (ending in 5491-L50)	18 U.S.C. § 1349 (ref. Count 1)
17	12/10/2015	LATIN- HUNTER	Name, date of birth (**/**/1967), and social security number (last four digits 4568) of K.B.	Fraudulent application and opening of LFCU membership (last four digits 6072), savings account (ending in 6072-S1), and vehicle loan (ending in 6072-L50)	18 U.S.C. § 1349 (ref. Count 1)

18	3/28/2016	CROSS	Name, date of birth (**/**/1952), and social security number (last four digits 7915) of M.C.	Fraudulent application and opening of LFCU membership (last four digits 5191), savings account (ending in 5191-S1), checking account (ending in 5191-S11) and personal loan (ending in 5191-L51)	18 U.S.C. § 1349 (ref. Count 1)
19	4/18/2016	BEAMON WYATT	Name, date of birth (**/**/1957), and social security number (last four digits 7432) of R.D.	Fraudulent application and opening of LFCU membership (last four digits 7388), savings account (ending in 7388-S1), checking account (ending in 7388-S11) and personal loan (ending in 7388-L51)	18 U.S.C. § 1349 (ref. Count 1)
20	5/03/2016	BEAMON PARKER	Name, date of birth (**/**/1961), and social security number (last four digits 2053) of M.K.	Fraudulent application and opening of LFCU membership (last four digits 8805), savings account (ending in 8805-S1), checking account (ending in 8805-S11) and personal loan (ending in 8805-L51)	18 U.S.C. § 1349 (ref. Count 1)
21	6/23/2016	CROSS MCKNIGHT	Name, date of birth (**/**/1983), and social security number (last four digits 9500) of M.B.	Fraudulent application and opening of LFCU membership (last four digits 3294), savings account (ending in 3294-S1), checking account (ending in 3294-S11) and personal loan (ending in 3294-L51)	18 U.S.C. § 1349 (ref. Count 1)

(In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c) and 2.)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Fifteen of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
3. The property subject to forfeiture includes, but is not limited to, the following:
 - a. A monetary judgment an amount representing the proceeds each defendant obtained from the scheme alleged in this indictment.

(In accordance with Title 18, United States Code, Section 982(a)(2)).

UNITED STATES v. MCKNIGHT ET AL., 4:17CR118

A TRUE BILL:

Redacted

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:

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